

REMARKS

The Office Action dated May 15, 2007 has been received and carefully noted. The above amendments to claims and the following remarks are submitted as a full and complete response thereto.

In accordance with the foregoing, claims 24, 45, and 47 been amended to improve clarity of the features recited therein. No new matter is being presented, and approval and entry are respectfully requested. As will be discussed below, it is also requested that all of claims 24-45 and 47 be found allowable as reciting patentable subject matter.

Claims 24-45 and 47 stand rejected and pending and under consideration.

Claims 24, 45, and 47 were rejected under 35 U.S.C. §102(b) as being anticipated by Neubauer (U.S. Patent No. 5,953,673). The rejection is respectfully traversed for the reasons which follow.

Claim 24, upon which claims 25-44 are dependent, recites a telecommunications system including a telecommunication network, a first station, and a plurality of second stations. The first station is configured to request a connection with at least one of said plurality of second stations, said connection request comprising a location criteria to be satisfied by at least one second station. The telecommunication network comprises at least one store configured to store location information for at least some of said second stations and a selection unit configured to select at least one of the second stations for connection when said connection request is received in dependence on the location

information stored in the store and the location criteria in the received connection request. The telecommunications system is further configured to connect the first station to the at least one second station selected by the selection unit.

Claim 45 recites a method for use in a telecommunications system comprising a telecommunication network, a first station and a plurality of second stations. The method includes defining at the first station a location criteria to be satisfied by at least one second station, requesting a connection with at least one second station satisfying said criteria, and selecting, within a selection unit of the telecommunication network, at least one of the second stations for connection when said connection request is received independence on stored location information and the location criteria in the received connection request. The method also includes establishing a connection between said first station and said at least one second station satisfying said location criteria.

Claim 47 recites telecommunications system including a telecommunication network, a first station, a plurality of second stations, defining means for defining at the first station a location criteria to be satisfied by at least one second station, and requesting means for requesting a connection with at least one second station satisfying said criteria. The system includes selecting means for selecting at least one of the second stations for connection when said connection request is received in dependence on stored location information and the location criteria in the received connection request, and establishing means for establishing a connection between said first station and said at least one second station satisfying said location criteria.

As will be discussed below, Neubauer fails to disclose or suggest the elements of the claims.

Neubauer generally describes a target subscriber of the target group defined by a group call number who is best suited with respect to the calling subscriber of the telecommunications network is selected in order to establish a connection with this mobile target subscriber. In Neubauer, a connection is established between the calling subscriber SA of the telephone network PSTN or the calling mobile subscriber SA' of the mobile radio network PLMN' and the called mobile target subscriber SB of the mobile radio network PLMN. See column 5, lines 59-62. Neubauer also describes a service control point SCP selecting on the basis of the information received the mobile subscriber of the target group best suited with respect to the calling subscriber SA or SA' as the mobile target subscriber SB. See column 9, lines 56-62. The best suited mobile target subscriber is the subscriber of the target group who is, for example, closest to the calling subscriber SA or SA'.

However, Neubauer does not teach or suggest a first station which is configured to request a connection with at least one of a plurality of second stations wherein the connection request comprises location criteria to be satisfied by at least one of the second stations. Rather, Neubauer appears to provide that a user of a first station dials a group call number which identifies the target group of mobile subscribers. If the call comes from the subscriber SA' of the mobile radio network PLMN' and a connection with the service control point SCP exists in this network, the determination of the location of the

subscriber SA' takes place in this mobile radio network PLMN'. See column 7, lines 7-11. No location criterion in Neubauer is sent in a connection request. The telecommunications network in Neubauer then determines the location of the calling party, as well as, the members of the target group and makes the connection between the calling party and one of the members based on their location by, for example, connecting to the target subscriber closest to the calling party.

As such, in the description provided in Neubauer, the user making the call cannot send any location criteria in order to guide the telecommunications network in making a selection. For example, it may be that a user wishes to call a taxi for a friend in a different location from where the user is currently located. In contrast, in accordance with the embodiment of the present invention, the user of the fast station may specify the location criteria in terms of the location of their friend and the telecommunications network could then use this information in order to select a taxi for connection.

Neubauer clearly fails to teach or suggest, at least, "first station is configured to request a connection with at least one of said plurality of second stations, said connection request comprising a location criteria to be satisfied by at least one second station," as recited in claim 24. Similarly, Neubauer does not disclose or suggest that "defining at the first station a location criteria to be satisfied by at least one second station, requesting a connection with at least one second station satisfying said criteria," as recited in claim 45. Furthermore, Neubauer fails to teach or suggest, at least, "defining means for defining at

the first station a location criteria to be satisfied by at least one second station,” as recited in independent claim 47.

Therefore, Neubauer does not disclose or suggest all the recitations of independent claims 24, 45, and 47. Claims 25-44 are dependent upon claim 24. Thus, claims 25-44 should be allowed for at least their dependence upon claim 24, and for the specific limitations recited therein.

In view of the foregoing, it is respectfully requested that independent claims 24, 45, and 47 and related dependent claims be allowed.

Claims 24-34, 36-41, 43-45, and 47 were rejected under 35 U.S.C. §102(b) as being anticipated by Tognazzini (EP 0810803). As will be discussed below, Tognazzini fails to disclose or suggest the elements of the claims.

Tognazzini generally describes an apparatus and method for establishing communications between a calling station and one or more called stations based on information stored in a database. A receiver receives a communication request including a query specifying at least one criterion. A comparator compares information stored in the database with the criterion, and a transmitter responds to the communications request when the information in the database satisfies the criterion.

Applicants respectfully submit that Tognazzini fails to disclose or suggest all of the elements of the present claims. For example, Tognazzini fails to disclose or suggest, at least, that “telecommunication network comprises at least one store configured to store location information for at least some of said second stations and a selection unit

configured to select at least one of the second stations for connection when said connection request is received in dependence on the location information stored in the store and the location criteria in the received connection request,” as recited in claim 24. Similarly, Tognazzini does not disclose or suggest that “selecting, within a selection unit of the telecommunication network, at least one of the second stations for connection when said connection request is received independence on stored location information and the location criteria in the received connection request,” as recited in claim 45. Furthermore, Tognazzini fails to teach or suggest, at least, “selecting means for selecting at least one of the second stations for connection when said connection request is received in dependence on stored location information and the location criteria in the received connection request,” as recited in independent claim 47.

According to Tognazzini, location information for the second stations is displayed to a user of the first station and the user of the first station selects which one of the second stations is to be connected by touching an icon on the display screen (Tognazzini, Column 13, lines 34-42). Figure 10 of Tognazzini illustrates that station 1010 originates a call over cellular system 1000 and individual stations 1020, 1030, and 1040, which each satisfy the query originated by station 1010, respond to the cellular system 1000 indicating that they satisfy the criteria.

According to embodiments of the present invention, however, a first station which requests a connection with at least one second station satisfying a location criteria and the telecommunications network then selects when the connection request is received which

of the second stations is to be connected depending upon stored location information from the second station and the location criteria in the received connection request. The telecommunications system then connects the first station to the at least one second station selected by the telecommunication network.

Consequently, one of the advantages provided by the claimed invention is that the location information for the second stations does not need to be displayed to the user of the first station. Similarly, the criteria for selecting which of the second stations is connected to the first station can be determined by the telecommunications system, rather than by the user of the first station. Furthermore, the telecommunications system may determine the second station that is to be connected to the first station based on criteria not available to the user of the first station.

Tognazzini does not disclose connecting the first station to the second station selected by the telecommunication system. Rather, Tognazzini only discloses connecting to a station that is selected by the user.

Therefore, Tognazzini does not disclose or suggest all the recitations of independent claims 24, 45, and 47. Claims 25-44 are dependent upon claim 24. Thus, claims 25-44 should be allowed for at least their dependence upon claim 24, and for the specific limitations recited therein.

In view of the foregoing, it is respectfully requested that independent claims 24, 45, and 47 and related dependent claims be allowed.

Claim 35 was rejected under 35 U.S.C. §103(a) as being unpatentable over Tognazzini in view of Nojima (U.S. Patent No. 5,933,080). The Office Action took the position that Tognazzini discloses all of the elements of claim 35, with the exception of determining means arranged to define an order in which connections to second stations satisfying the location criteria are to be attempted. The Office Action then relies upon Nojima as allegedly curing this deficiency in Tognazzini. The above rejection is respectfully traversed for the following reasons.

Tognazzini is discussed above. Nojima discloses an emergency calling system. When it is necessary to make an emergency call about a vehicle station, a Mayday center performs an emergency call to a plurality of emergency contacts in an order of priority according to the vehicle station's present location. The order of priority of the emergency contact addresses is determined according to vehicle station location.

Applicants note that claim 35 is dependent upon claim 24. Additionally, Nojima fails to cure the deficiencies in Tognazzini discussed above with respect to claim 24. Therefore, Applicants respectfully submit that claim 35 should be allowed for at least its dependence upon claim 24, and for the specific limitations recited therein.

Claim 42 was rejected under 35 U.S.C. §103(a) as being unpatentable over Tognazzini in view of Tayloe (U.S. Patent No. 5,809,418). The Office Action took the position that Tognazzini discloses all of the elements of claim 42, with the exception of making the call at a subsequent time when the second station satisfies the location

criteria. The Office Action then relies upon Tayloe to cure this deficiency in Tognazzini. This rejection is respectfully traversed for the following reasons.

Tognazzini is discussed above. Tayloe discloses a position dependent call connection method and apparatus in a radio communication system. Tayloe further discloses calculating opportunity times when there is a high likelihood of establishing a link between a target communication unit and a satellite. These opportunities are calculated by predicting the satellite's future positions with respect to an optimal call initiation area. The opportunity times are sent to the source communication unit so that the user knows when to attempt another call.

Applicants note that claim 42 is dependent upon claim 24. Additionally, Tayloe fails to cure the deficiencies in Tognazzini discussed above with respect to claim 24. Therefore, Applicants respectfully submit that claim 42 should be allowed for at least its dependence upon claim 24, and for the specific limitations recited therein.

Applicants respectfully submit that Tognazzini, Nojima, and Tayloe, whether considered alone or in combination, fail to disclose or suggest critical and important elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 24-45 be allowed, and this application passed to issue.

In view of the above, Applicants respectfully submit that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicants further submit that the subject matter is more than sufficient to render the

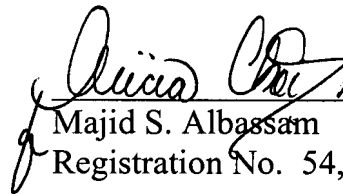
claimed invention unobvious to a person of skill in the art. Applicants therefore respectfully request that each of claims 24-45 and 47 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicants respectfully petition for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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